

THE HONORABLE KYMBERLY K. EVANSON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NORTHWEST ADMINISTRATORS, INC.,

Plaintiff,

v.

DHL EXPRESS (USA), INC., an Ohio
corporation,

Defendant.

Case No. 2:25-cv-00921-KKE

**STIPULATED MOTION FOR A
SECOND EXTENSION**

NOTE ON MOTION CALENDAR:
July 2, 2025

STIPULATION

Defendant DHL Express (USA), Inc., and Plaintiff Northwest Administrators, Inc. hereby STIPULATE AND AGREE to extend the deadline for Defendant to answer or otherwise respond to the Complaint to July 21, 2025.

On May 28, 2025, Plaintiff served the Complaint on Defendant. The parties stipulated, and the Court granted, an extension of Defendant's answer or other response to July 7, 2025. Counsel for Plaintiff and Defendant have since made good effort to confer and evaluate the alleged outstanding documents related to audit efforts of the pension trust fund but require more time to complete their respective investigations. Accordingly, there is good cause to grant the parties' stipulated request for additional time so that the parties and the Court have ample time to address

1 and consider all such issues, including the efficient and speedy disposition of the issues.
 2 Accordingly, Plaintiff and Defendant stipulate and agree, subject to the Court's approval, to extend
 3 the Defendant's deadline to answer or otherwise respond to July 21, 2025.

4 This stipulation and order shall not operate as an admission of any factual allegation or
 5 legal conclusion, nor shall it operate as a waiver, nor affect any right, defense, claim or objection,
 6 including lack of jurisdiction and the right to seek arbitration of Plaintiff's claims.

7
 8 STIPULATED AND AGREED to this 2nd day of July, 2025.

9
 10 **REID, MCCARTHY, BALLEW & LEAHY,
 LLP**

11 By: s/ Russell J. Reid
 12 Russell J. Reid, WSBA # 2560
 13 100 West Harrison Street, N. Tower, #300
 Seattle, WA 98119
 Phone: (206) 285-0464
 14 Email: rjr@rmbllaw.com

15 *Attorney for Plaintiff*
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25
 26

MORGAN, LEWIS & BOCKIUS LLP

By: s/ Amy P. Taylor
 Amy P. Taylor, WSBA #53644
 1301 Second Avenue, Suite 3000
 Seattle, WA 98101
 Phone: (206) 274-6400
 Email: amy.taylor@morganlewis.com

Melissa D Hill (*Pro Hac Vice*)
 101 Park Avenue
 New York, NY 10178
 Phone: (212) 309-6318
 Email: melissa.hill@morganlewis.com

Attorneys for Defendant

ORDER

IT IS SO ORDERED.

DATED: July 3, 2025.



Kymberly K. Evanson
United States District Judge

Presented by:

MORGAN, LEWIS & BOCKIUS LLP

By: s/ Amy P. Taylor

Amy P. Taylor, WSBA # 53644
1301 Second Avenue, Suite 2800
Seattle, WA 98101
Phone: (206) 274-6400
Email: amy.taylor@morganlewis.com

Melissa D Hill (*Pro Hac Vice*)
101 Park Avenue
New York, NY 10178
Phone: (212) 309-6318
Email: melissa.hill@morganlewis.com

Attorneys for Defendant

**REID, MCCARTHY, BALLEW & LEAHY,
LLP**

By: s/ Russell J. Reid

Russell J. Reid, WSBA # 2560
100 West Harrison Street, N. Tower, #300
Seattle, WA 98119
Phone: (206) 285-0464
Email: rjr@rmbllaw.com

Attorney for Plaintiff